

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

District of Oregon

FILED 18 JUL '13 16:05 USDC-ORP

United States of America

v.

LEE CROAK

Case No.

'13-MJ-109

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 12, 2013 in the county of Multnomah in the  
District of Oregon, the defendant(s) violated:

## Code Section

18 USC 2113(a)

## Offense Description

by force and violence or intimidation, knowingly and unlawfully take from the presence of employees of the Key Bank located at 3515 SW Troy in the City of Portland, Oregon, Multnomah County, Oregon, approximately seven hundred and sixty seven dollars in United States currency (\$767), which was then in the care, custody, control, possession, and management of that bank, whose deposits were then insured by the Federal Deposit Insurance Corporation (FDIC), in violation of Title 18 United States Code, Section 2113 (a)

This criminal complaint is based on these facts:

see affidavit of Brett Hawkinson

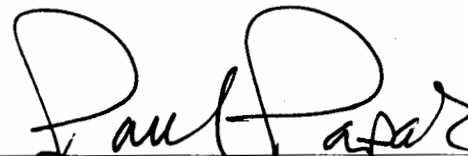
☒ Continued on the attached sheet.


Complainant's signature

Brett Hawkinson, Police Detective

Printed name and title

Sworn to before me and signed in my presence.

Date: 7-18-2013City and state: Portland, OR


Judge's signature

Paul Papak

Printed name and title

US Magistrate Judge

STATE OF OREGON

County of Multnomah

)  
) ss. AFFIDAVIT OF BRETT HAWKINSON  
)

I, Brett S. Hawkinson, being first duly sworn, depose and state:

1. I am a police detective with the Portland Police Bureau currently assigned to robbery investigations. As part of my duties, I am also designated as a Task Force Officer (TFO) with the Federal Bureau of Investigation (FBI) bank robbery task force and have been designated as such since March 31<sup>st</sup>, 2010. My total law enforcement experience includes 11 years as a Portland Police officer, and three years of employment with the City of Lynnwood, Washington, Police Department.

PURPOSE OF THIS AFFIDAVIT

2. This affidavit is submitted to support a complaint and arrest warrant for KIMBERLY ANN BISHOP, a white female adult, approximately 38 years old, and for LEE CROAK, a white male adult, approximately 43 years old, for one count of Bank Robbery, in violation of Title 18, United States Code, Section 2113(a). This affidavit also seeks to support a search warrant for a 1997 Dodge Stratus four door, silver in color, with Oregon plate 924FSP and VIN 1B3EJ46X5VN633104, which was driven by CROAK in the course of fleeing the robbery scene.

SUMMARY OF INVESTIGATION

3. Through the course of my duties, I have become familiar with the investigation of a bank robbery at the Key Bank located at 3515 SW Troy in the City of Portland, Oregon, on Friday July 12, 2013, at approximately 3:51 p.m. Key Bank is a financial institution that is insured by the Federal Deposit Insurance Commission. This affidavit does not contain all facts known to me regarding this investigation, but instead contains only those facts which I believe are

sufficient to establish probable cause. I have read police reports, spoken to involved officers, and familiarized myself with other aspects of the investigation, and know that on Friday July 12, 2013, at approximately 3:51 p.m. a robbery was committed at the aforementioned bank.

4. The victim teller reported to Portland Police that a female subject, hereafter referred to as "the robber," approached the victim teller's window, and presented a demand note that on one side read something similar to: "This is a robbery Do not panic. There are two men w/ me; heavily armored. Remain calm and empty your drawer. No Little Bills! No Ink packages! No tracers! I will call them in 10 mins. And tell them all is good. If I don't." The reverse side of the note read: "Fill the bag now! Call within 10 mins. Things will become extremely vilotale. Starting with you. After 10 mins. You can report the robbery NO SOONER" The victim teller heard the robber tell the victim teller that she had a gun and would not hesitate to use it. The victim teller reported that the robber was holding her hand in a black nylon bag as if she were holding a gun and pointing it at the teller. The robber repeated to the victim teller, "You pushed the alarm didn't you?" over and over to the victim teller. The victim teller said she was very scared, and handed over the money, along with bait money, to the robber, who took the money and exited the bank. The total amount given to the robber was approximately seven hundred and sixty seven dollars in United States currency (\$767), which included approximately four hundred dollars in ones and bait bills with recorded serial numbers.

5. The victim teller described the robber as a white female, about five feet, five inches tall, thin build, with darkish red hair, wearing oversized sunglasses, a white T-shirt, and a baseball cap.

6. Additional Portland Police officers responded to the area of the bank and began looking for the suspect. While responding to the bank, officers received information that a vehicle

carrying stolen money was travelling on SW Naito. Officer Jason Walters determined that a silver Dodge Stratus with Oregon plate 924FSP was carrying money stolen from the bank. Officer Walters lost the vehicle in heavy traffic on SE Hawthorne Blvd at about SE Grand Avenue.

7. Key Bank e-mailed me still images of the suspect from the video surveillance. From the video surveillance, I saw the female was wearing large sunglasses, was carrying a small black bag, and was holding a blue Gatorade bottle.

8. Other responding officers located the Dodge Stratus parked and abandoned in a driveway to a business at 833 SE Main Street. I responded to the car and saw the vehicle had the windows partially rolled down. The car was blocking two garage doors. I spoke to the tenants of the business, who advised me that where the car was parked was an unusual place for patrons to park. I could see a pair of black sunglasses in the back seat that appeared to be similar to the sunglasses worn by the robber. There was a large pile of clothes in the backseat.

9. A witness observed two people leave the car and walk away. The witness described the driver as a white male, about 45 years old, with blonde "spikey" hair, pock-marked skin on his face, and wearing a gray T-shirt.

10. Officer Doris Paisley observed two subjects at the corner of SE 8<sup>th</sup> and Salmon, which is approximately one block from the location of the abandoned suspect vehicle. The two subjects, a male and a female, matched the previously broadcast descriptions of the female bank robber and the male driver. Officer Paisley stopped and spoke with the two subjects. While Officer Paisley was talking with the subjects, the witness who saw the driver of the car positively identified the male as the person who was driving the silver Dodge Stratus. I compared the bank surveillance image to the female, and believed the female was the same person. As I compared



the surveillance to the female, I saw the male subject muttering softly to the female, "Don't say anything."

11. Detective John Russell and I conducted a field interview with the male subject, who identified himself as "RAVI CROAK" with date of birth "02/18/1971." After I advised CROAK of his Miranda Rights, he requested the presence of an attorney. Detective Russell and I then arrested CROAK (whose true name was LEE CROAK). We conducted a search incident to arrest of CROAK, and located a black nylon bag concealed in CROAK'S right pants leg. The black nylon bag appeared to be the same bag as used in the robbery. The bag felt as if there was money inside. When we opened the bag, we discovered three hundred and twelve dollars (\$312) in US currency, all in one dollar bills.

12. The silver Dodge Stratus was photographed and towed to the Rivergate Police Storage Facility located at 7027 NW St Helens Road in the City of Portland, Multnomah County, State of Oregon, as evidence.

13. LEE CROAK and the female, KIMBERLY BISHOP, were transported to the Detective Division. I advised KIMBERLY BISHOP of her Miranda Rights. When I asked if she understood, she replied that she did. BISHOP subsequently confessed to robbing the bank in Southwest Portland, and wrote the teller a letter of apology.

14. I examined the demand note, and saw that it was written from a piece of lined stationery with a six-petaled flower at the bottom of the page. The note appeared to be written in black ink.

15. Based on the foregoing, I have probable cause to believe that the defendants, acting as principals and aiding and abetting each other, did, by force and violence or intimidation, knowingly and unlawfully take from the presence of employees of the Key Bank located at 3515 SW Troy in the City of Portland, Oregon, Multnomah County, Oregon, approximately seven

hundred and sixty seven dollars in United States currency (\$767), which was then in the care, custody, control, possession, and management of that bank, whose deposits were then insured by the Federal Deposit Insurance Corporation (FDIC), in violation of Title 18, United States Code, Section 2113(a).

16. I therefore request that an arrest warrant be issued for KIMBERLY BISHOP, a white female with date of birth 02-10-1975, and LEE CROAK, a white male with date of birth 12-20-1975 for the crimes of Bank Robbery.

17. I also request the court to issue a search warrant for the silver Dodge Stratus with Oregon plate 924FSP, currently located at the Portland Police Bureau's Rivergate Storage Facility, 7027 NW St Helens Road in the City of Portland, Multnomah County, State of Oregon, authorizing police officers or federal agents to search for and seize the following items of evidence of the crime of bank robbery:


- a) US currency, specifically four hundred and fifty five dollars (\$455) taken from the bank, including bait bills,
- b) Clothing, including oversized sunglasses, a white T-shirt, and a baseball cap
- c) A blue Gatorade bottle
- d) A pad of paper or other stationery that matched the demand note left at the Key Bank
- e) A black ink pen
- f) Fingerprints



39657

Brett Hawkinson  
Detective/FBI Task Force Officer  
Portland Police Bureau  
Portland, Oregon

Subscribed and sworn to before me this 18<sup>th</sup> day of July, 2013.



HONORABLE PAUL PAPAK  
United States Magistrate Judge